

## LAW OFFICES OF HAROLD R. BURKE

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Via email

August 15, 2022

# MEMO ENDORSED

Hon. Kenneth M. Karas  
United States District Court  
300 Quarropas Street, Chambers 533  
White Plains, New York 106001-4150

*Re: Catherine Kassenoff v. Allan Kassenoff et al.*  
*7:22-CV-002162-KMK*

Dear Judge Karas:

I represent the plaintiff Catherine Kassenoff in this action, and I am requesting an extension of time within which to respond to the Defendants' motion to dismiss, due today, through and including Friday, August 19, 2022.

In accordance with your individual practice rules, such requests are ordinarily to be made on five (5) days' notice. However, I believe that extenuating circumstances have arisen. This is the plaintiff's first such request.

On Friday, August 12, 2022 at approximately 1:00 PM, I was contacted by Connecticut authorities and questioned regarding my then present whereabouts; I was at home in Harrison, New York working on the plaintiff's brief. I was then informed that my vehicle was involved in the commission of two robberies in North Haven, Connecticut earlier that day. Thinking this to be a prank, I was then asked to verify the location of my vehicle - it was not in my driveway. I was instructed to immediately contact the Harrison Police Department, which I did. The balance of the day, and continuing into Saturday, was spent addressing questions regarding the theft, missing property, and insurance related issues. Saturday morning, I also learned that a close relative had died on Friday.

I notified defendants this morning of these circumstances and requested their consent to my request for an extension. As of this time, I have not received a response from either individual.

As of this date, the brief is substantially completed but given court commitments this week, I anticipate being able to complete and file the brief on or before Friday, August 19<sup>th</sup>.

Under the circumstances, I respectfully request that this extension be granted.

Respectfully,

A handwritten signature in black ink, appearing to read "H.R.B.", with a long horizontal stroke extending to the right.


Harold R. Burke

HRB/st

cc. Client  
Allan Kassenoff, Esq. [kassenoffa@gtlaw.com](mailto:kassenoffa@gtlaw.com)  
Gus Dimopoulos, Esq. [gd@dimolaw.com](mailto:gd@dimolaw.com)

Granted.

SO ORDERED

A handwritten signature in black ink, appearing to read "K. Karas", with a long horizontal stroke extending to the right.  
KENNETH M. KARAS U.S.D.J.

August 15, 2022